

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

INSITUFORM TECHNOLOGIES, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 04 10487 GAO
	)	
AMERICAN HOME ASSURANCE COMPANY,	)	
	)	
Defendant.	)	

**AFFIDAVIT OF CHRIS CAMPOS**

I, Chris Campos, being duly sworn do hereby depose and state:

1. I am a principal with the accounting firm of Campos & Stratis. I have been retained by Insituform Technologies, Inc. to render expert opinion on the value of Insituform's recoverable damages in this case. The statements in this affidavit and in my report are based on personal knowledge or my investigation and are true and correct to the best of my understanding.

2. My credentials as an expert in this area are set forth in my CV, which is attached to the report I prepared in this case. For the past forty five years as a certified public accountant, I have virtually limited my practice to the evaluation of insurance claims on behalf of insurance companies and insureds. A true and correct copy of my report is attached as Exhibit A to this Affidavit.

3. Insituform submitted the MWRA claim to both its primary carrier, Liberty Mutual, and its excess carrier, American Home. Liberty Mutual acknowledged coverage and paid Insituform its policy limit of \$1,000,000.

4. Assuming that the American Home policy provides coverage for the MWRA claim, and as explained and qualified in my report, the total amount of recoverable loss is

\$7,398,299.05, which is Insituform's actual cost to remove and replace the installed pipe.

American Home's share of the recoverable loss is \$6,398,299.05, as explained and qualified in my report. The opinions in my report are based on a reasonable degree of accounting certainty.

Signed under the pains and penalties of perjury this 6<sup>th</sup> day of September 2006.

By: *Chris Campos*  
CHRIS CAMPOS

Signed and Sworn to before  
me this 6 day of September, 2006

*Carol Salesky*

Notary Public

# 4024852\_v1

**CAROL SALESKY**  
Notary Public  
State of New Jersey  
Commission Expires Dec. 12, 2008